

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

WINERIES OF THE OLD MISSION  
PENINSULA ASSOCIATION, *et al.*,

Plaintiffs,

Case No: 1:20-cv-01008

v.

PENINSULA TOWNSHIP, Michigan Municipal  
Corporation,

Honorable Paul L. Maloney  
Magistrate Judge Ray S. Kent

Defendant,

and

PROTECT THE PENINSULA,

Intervenor-Defendant.

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**PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES FROM  
INTERVENOR-DEFENDANT PROTECT THE PENINSULA**

Plaintiffs, through their attorneys Miller, Canfield, Paddock and Stone, PLC, move pursuant to Federal Rules of Civil Procedure 26, 33, 34, and 37 for an order compelling Defendant-Intervenor Protect the Peninsula ("PTP") to fully respond to Requests for Production 1-15 and 22-32 and Interrogatories 1 and 3-9. Plaintiffs conferred in good faith with PTP by sending a letter detailing the deficiencies in PTP's discovery responses and holding a meet and confer on May 11, 2023 to discuss the deficiencies. This motion reflects the outstanding issues that have not been resolved between the parties.

WHEREFORE, Plaintiffs request that this Court enter an order compelling PTP to fully respond to Requests for Production 1-15 and 22-32 and Interrogatories 1 and 3-9, awarding Plaintiffs their costs and attorney fees incurred in bringing this motion, and awarding Plaintiffs any other relief this Court deems necessary.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Joseph M. Infante

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Dated: May 12, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2023, I filed the foregoing via the Court's CM/ECF System, which will automatically provide notice of the filing to all registered participants in this matter.

/s/ Joseph M. Infante

Joseph M. Infante